

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other
persons similarly situated, known and unknown,)

Plaintiff,)

v.)

STAFFING NETWORK HOLDINGS, LLC d/b/a)
STAFFING NETWORK and PHILIPS)
ELECTRONICS NORTH AMERICA)
CORPORATION, and PONTOON SOLUTIONS,)
INC.)

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**PLAINTIFF'S MOTION TO SUPPLEMENT PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF THE STIPULATION OF SETTLEMENT BETWEEN PLAINTIFFS
AND DEFENDANTS STAFFING NETWORK HOLDINGS, LLC, PHILIPS
ELECTRONICS NORTH AMERICA CORPORATION, AND PONTOON SOLUTIONS,
INC**

Plaintiff, through her attorneys, moves for leave of this Court to supplement her Motion for Final Approval of the Stipulation of Settlement between Plaintiff and Defendants Staffing Network Holdings LLC ("Staffing Network"), Philips Electronics North America Corporation ("Philips"), and Pontoon Solutions Inc., ("Pontoon") ("the Settlement"), by submitting a detailed fee petition, attached hereto as Exhibit A. In support of her Motion to Supplement Plaintiff states as follows:

1. On March 10, 2015, this Court granted Preliminary Approval to the Parties' settlement of Plaintiff's claims on behalf of herself and of a class of other similarly situated employees for Defendants' alleged violations of the Fair Labor Standards Act, 29 U.S.C. §201 *et seq.*, ("FLSA"), and the Illinois Minimum Wage Law, 820 ILCS 105/1, *et seq.*, ("IMWL"), and the Illinois Day and Temporary Labor Services Act, 820 ILCS 175/1 *et seq.*, ("IDTLA").

2. Plaintiff filed her Motion for Final Approval of the Settlement on July 20, 2015. *See* Docket Entry No. 137.

3. This matter is set for a hearing on Plaintiff's Motion for Final Approval of the settlement on July 24, 2015 at 11:00 AM.

4. Plaintiff's Counsel has requested an award of 30% of the settlement amount, or \$75,000.00 in accordance with the settlement between the Parties. *See* Plaintiff's Memorandum in Support of Plaintiff's Motion for Class Certification. *See* Docket Entry No 138.

5. Plaintiff now seeks leave to of this Court to supplement Plaintiff's Motion for Final Approval of the Settlement by submitting Plaintiff's Fee Petition, attached hereto as Exhibit A, including a detailed description of Plaintiff's attorneys' fees and costs in this case.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order allowing Plaintiff to supplement her Motion for Final Approval of the Settlement between the Parties by submitting the Plaintiff's fee petition attached hereto as Exhibit A.

Respectfully Submitted,

Dated: July 22, 2015

s/Christopher J Williams
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